

Subject: ETAAC Discussion Draft Report
From: Jerecycl@aol.com
Date: Fri, 18 Jan 2008 16:13:59 -0500 (EST)
To: schurch@arb.ca.gov

I am writing on behalf of Community Recycling and Resource Recovery, Inc. (Community Recycling) to provide comments on the ETAAC Report Discussion Draft to be discussed at the January 25, 2008 ETAAC meeting. My comments relate in particular to the portions of the report related to Waste Reduction, Recycling and Resource Management and to Agriculture.

Section 4-IV Waste Reduction, Recycling, and Resource Management

I am pleased to see that the Committee has added recommendations that reflect recognition of the substantial role both recycling and composting can play in the reduction of greenhouse gases in California, as well as recommendations to remove barriers to composting, phase out diversion credit for greenwaste ADC, and develop emission reduction protocols for recycling and composting.

Section 6 Agriculture

While the Agriculture section of the report does refer readers back to discussions of composting in Section 4-IV, we recommend that this section more specifically reference and highlight the potential role of composting in Section 6-E (Soil Carbon Sequestration) and Section 6-G (Fertilizer Use and Water Management Efficiency). As we and others have noted in earlier comments to CARB and the CIWMB, many studies have documented the additional benefits of using compost related to the reduced agricultural use of chemical fertilizers and pesticides, water conservation, and composting's ability to improve soil health and crop yields. Composting certainly provides many of the co-benefits recognized as important in the ETAAC Report and an opportunity for multi-agency and industry cooperative efforts.

One particular study, "A Life Cycle Inventory and Life Cycle Assessment for Windrow Composting Systems", undertaken in 2003 by the New South Wales Department of Environment and Conservation (Australia), emphasized the particular benefits of compost for vineyards, an agricultural industry identified as at risk in California as a result of global warming. This study used references from all over the world and growing conditions in the area of Australia referenced in the report have much in common with the Central Valley.

Additional field studies to further quantify the specific benefits of composting to California crops should be encouraged in the ETAAC report.

Community Recycling owns and operates several recycling, composting, and alternate energy facilities which achieve greenhouse gas reductions in California. We also own over 3,600 acres of farmland and vineyards that benefit from the use of compost to increase crop yields, while decreasing fertilizer, pesticide, and water use. As a result we see both the potential for increasing greenhouse gas reductions through expansion of these currently available technologies and the problems and lost opportunities created through disposal of municipal solid waste in solid waste landfills.

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